

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

IN RE: TAASERA LICENSING LLC, PATENT LITIGATION	§ § § § § § §	Case No. 2:22-MD-03042-JRG <u>JURY TRIAL DEMANDED</u>
THIS DOCUMENT RELATES TO ALL ACTIONS		

JOINT MOTION FOR ENTRY OF AGREED NINTH DOCKET CONTROL ORDER

Pursuant to this Court’s Eighth Amended Docket Control Order dated September 7, 2023 (Dkt. 278), the Parties comprising Taasera Licensing LLC (“Taasera”), Palo Alto Networks Inc. (“Palo Alto Networks”), Check Point Software Technologies, Ltd. (“Check Point”), Trend Micro Incorporated (“Trend Micro Japan”), CrowdStrike, Inc. and CrowdStrike Holdings, Inc. (collectively, “CrowdStrike”), Fortinet, Inc. (“Fortinet”), and Musarubra US LLC d/b/a Trellix (“Trellix”) (collectively, “Defendants”) hereby file this joint motion for entry of the Ninth Amended Docket Control Order.

The Parties jointly request that the Court enter the attached agreed proposed docket control order, which extends the deadline to complete fact discovery for the limited purposes of completing depositions that are properly noticed by the current November 6, 2023 deadline, by approximately one month. The Parties do not request that the Court move the currently-scheduled pretrial conference date or trial date, but several other dates are affected by the current proposal including the dispositive motions date. The Parties jointly submit that there is good cause for such extensions. Three of the Defendants (Palo Alto Networks, Check Point, and Fortinet) have some or all of their relevant witnesses located in Israel, who are currently impacted by armed conflict and are not available to be deposed within the current fact discovery period. The Parties therefore

submit that good cause exists for the requested extension.

Dated: October 27, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on October 27, 2023, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ *Melissa R. Smith*

Melissa R. Smith

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that all counsel of record has met and conferred in accordance with Local Rule CV-7(h) and this joint motion is unopposed.

/s/ *Melissa R. Smith*

Melissa R. Smith